

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,  
  
Plaintiff,  
  
v.  
  
PLAZA HOTELS, LLC, et al.,  
  
Defendants.

Case No.: 5:25cv462

Judge Charles B. Goodwin

**JOINT MOTION TO STAY BRIEFING  
ON DEFENDANT CHAND & SAAJ  
HOSPITALITY INC.'S PENDING  
MOTION TO DISMISS**

Plaintiff Nancy R. (“Nancy” or “Plaintiff”), by and through her undersigned attorney, and Defendant Chand & Saaj Hospitality Inc. (“Chand & Saaj”) respectfully move the Court to stay briefing on Chand & Saaj’s Motion to Dismiss (Doc. 59) pending the Court’s decision on Plaintiff’s pending Motion for Leave to Amend her complaint. (Doc. 58.)

Additionally, if the Court grants Plaintiff’s motion for leave to amend<sup>1</sup>, then the parties hereby agree and stipulate that the filing of Plaintiff’s First Amended Complaint will moot Chand & Saaj’s pending motion to dismiss, and that Chand & Saaj may then file a renewed motion to dismiss or another response directed to the First Amended Complaint.

Alternatively, if the Court denies Plaintiff’s motion for leave to amend, then the parties jointly move the Court to extend Plaintiff’s time to respond to Chand & Saaj’s pending motion to dismiss until seven (7) days following the Court’s order denying Plaintiff’s motion for leave.

Good cause exists to grant the requested stay because it will conserve both the parties’ and this Court’s resources if all Defendants who wish to file motions to dismiss do so at the same time and directed to the same pleading, particularly because this will enable Plaintiff to respond to Defendants’ motions in a single omnibus brief.

The Court should therefore stay briefing on Chand & Saaj’s pending motion to dismiss.

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<sup>1</sup> Although Chand & Saaj takes no position here on the question of whether the motion for leave to amend should be granted, it hereby expressly reserves the right to respond in opposition to that motion in a separate filing.

Dated: June 11, 2025

Respectfully submitted,

/s/ Geoffrey C. Parker

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2025 a true and correct copy of Plaintiff's Motion for Leave to Amend Complaint [Doc. 58] was served by regular mail on the following, who are not registered participants of the ECF System:

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